

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PMG Data Services, Inc.,)	
)	
Plaintiff,)	
)	Case No. 08 C 854
v.)	
)	Honorable Judge Norgle
Robert J. McNally and)	
Hallmark Data Systems LLC,)	Magistrate Judge Ashman
)	
Defendants.)	

**DEFENDANT ROBERT J. McNALLY'S
MOTION FOR AN EXTENSION OF TIME IN
WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendant, Robert J. McNally ("McNally"), by and through his attorney, Jeffrey D.

Hupert of Riordan, Fulkerson, Hupert & Coleman, hereby states the following as his Motion for an Extension of Time in Which to Answer or Otherwise Plead as follows:

1. The Complaint herein was filed on February 8, 2008. It was served on McNally on February 12 or 13, 2008. Therefore, McNally's Appearance and Response to the Complaint are due on or before March 3 or 4, 2008.
2. Counsel for McNally has already filed his Appearance in this matter.
3. The Complaint alleges four purported causes of action directed at McNally, set forth in 56 paragraphs, some of which contain more than one allegation.
4. McNally and his counsel have been working diligently to prepare a response to the Complaint. However, due to both the length and complexity of the Complaint and McNally's counsel's schedule, counsel will be unable to complete and file a responsive pleading to the Complaint.
5. No party will be unduly prejudiced by allowing the relief sought herein.

6. Counsel for Plaintiff does not object to this Motion.

WHEREFORE, Plaintiff Robert J. McNally requests an extension of time for him to answer or otherwise plead to Plaintiff's Complaint.

Respectfully submitted,
Defendant Robert J. McNally

By: /s/ Jeffrey D. Hupert
One of his Attorneys

Jeffrey D. Hupert (ARDC No. 3121829)
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CERTIFICATE OF SERVICE

I, Jeffrey D. Hupert, on oath, certify that on February 28, 2008, I caused a copy of this ***Defendant Robert J. McNally's Motion for an Extension of Time in Which to Answer or Otherwise Plead*** to be served on the person listed below, as indicated, properly addressed at or before the hour of 5:00 p.m.

VIA ELECTRONIC MAIL

Adam L. Saper, Esq.
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Under penalties as provided by law pursuant to
735 ILCS 5/1-109, I certify that the statements
set forth herein are true and correct.

By: /s/ Jeffrey D. Hupert
Attorney for Robert J. McNally

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